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12 *Counsel for Defendants Jeffery L. Taylor, Don L. Taylor,*
13 *L. John Lewis, S. Randall Oveson, and Gannon Giguere, and for*
Nominal Defendant Eco Science Solutions, Inc.

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 HANS MENOS, derivatively on behalf of
17 ECO SCIENCE SOLUTIONS, INC.,

18 Plaintiff,

19 v.

20 JEFFERY L. TAYLOR, DON L.
TAYLOR, L. JOHN LEWIS, S.
21 RANDALL OVESON, and GANNON
GIGUIERE,

22 Defendants,

23 and

24 ECO SCIENCE SOLUTIONS, INC.,

25 Nominal Defendant.
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Case No. 3:17-CV-00662-LRH-VPC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANTS AND NOMINAL
DEFENDANT TO RESPOND TO
COMPLAINT FOLLOWING DENIAL
OF MOTION TO DISMISS OR STAY
ACTION**

(First Request)

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**STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS AND NOMINAL
DEFENDANT TO RESPOND TO COMPLAINT FOLLOWING DENIAL OF MOTION
TO DISMISS OR STAY ACTION**

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon Giguere (collectively, "Defendants") and Nominal Defendant Eco Science Solutions, Inc. ("Nominal Defendant"), by and through their counsel, the law firm of Greenberg Traurig, LLP, and Plaintiff Hans Menos, by and through his counsel the law firms of Levery & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A., hereby stipulate and agree to extend the deadline for the Defendants and the Nominal Defendant to respond to the Complaint in this action by 45 days, through and including **September 27, 2018**, and request that the Court enter an order approving the same.

Counsel for Defendants and Nominal Defendants request additional time to analyze the full scope of the claims made by all plaintiffs in all jurisdictions, particularly in light of a fourth derivative action filed in a different jurisdiction since the first stipulated extension, and to prepare a response and defense that best promotes convenience, economy and consistency. Plaintiff's counsel have agreed to the extension as a professional courtesy.

This is the second stipulation for an extension of time for any of the Defendants or the Nominal Defendant to respond to the Complaint.

Dated: August 13, 2018

Dated: August 13, 2018

By: /s/ Joel Max Eads

By: /s/ Patrick R. Levery

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Attorneys for Plaintiff

*Attorneys for Defendants and Nominal
Defendant*

IT IS SO ORDERED.

Dated: 8/15/18

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2 **IT IS SO ORDERED:**

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4 **UNITED STATES DISTRICT/MAGISTRATE JUDGE**

5 **DATED:** _____
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